

FEDERAL DEFENDER SERVICES  
OF WISCONSIN, INC.

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September 15, 2021

Honorable Stephen L. Crocker  
United States Magistrate Judge  
120 North Henry Street  
Madison, Wisconsin 53703

Re: *United States v. Steven Robeson*  
Case No. 21-cr-24-wmc

To the Honorable Stephen L. Crocker,

The defense moves to strike the remaining calendar dates because this case has settled. Unfortunately, as explained below, the defense does not have a signed plea agreement. I have spoken to AUSA Elizabeth Altman and she joins in this request.

Over the past two months, the attorneys discussed this case and were able to (in principle) resolve it to an 11(c)(1)(c) plea for two years probation. I conveyed this offer orally to Mr. Robeson and he agreed to accept it. Unfortunately, he had contracted COVID, and I did not want to go and meet with him to go over the plea agreement and have it signed. So I sent him the plea in the mail and then went over it telephonically with him. He then signed it and sent it back to me. That was over a week ago. Unfortunately, the signed plea has not arrived yet. Given the posture and circumstances of this case, the defense would ask that the remaining dates be struck. Once the plea is received, we will file it; and if it's not received within a week, we will work out other means of getting it signed. Again, I have spoken to AUSA Elizabeth Altman and she joins in this request.

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Thank you for your attention to this matter.

Sincerely,

*/s/ Joseph A. Bugni*

Joseph A. Bugni  
Associate Federal Defender